

November 26, 2018

Via ECF

The Honorable Judge Lorna G. Schofield United States District Court for the Southern District of New York Courtroom 1106 40 Centre Street New York, NY 10007

Re: PEN American Center, Inc. v. Trump, No. 1: 18-cv-09433-LGS

Dear Judge Schofield,

Pursuant to the Court's Memo Endorsement dated November 20, 2018 (ECF No. 18), the Plaintiff submits this letter in support of the Letter Motion to Adjourn Conference (ECF No. 17), filed with consent of Defendant in the above-referenced action.

As reason therefor, Plaintiff states that one of its lead attorneys, David Schulz of the Yale Media Freedom of Information and Access Clinic, has a previously scheduled trip to Indonesia, where he will be from December 6 though December 25, 2018. Attorney Schulz will be unable to appear for the initial pretrial conference if it is held on December 11, 2018. Plaintiff's counsel has conferred with Defendant's counsel, who consents to the proposed adjournment to January 7, 2019 or a date thereafter that is convenient for the Court.

Besides the related Letter Motion that preceded this filing, Plaintiff has not sought extension and no other scheduled dates will be affected if the proposed adjournment is granted. For the court's awareness, the government's response to the complaint is currently due December 24, 2018. Defendant's counsel has informed Plaintiff's counsel of its intention to timely file a pre-motion-to-dismiss letter in accordance with the Court's individual rules.

Respectfully submitted,

S

Kristy Parker

cc: All Counsel of Record (via ECF and email)

The Protect Democracy Project 2020 Pennsylvania Ave NW, #163 Washington, DC 20006